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File No. 007602.000034

March 21, 2016

VIA ECF

Honorable Brian M. Cogan, U.S.D.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**RE: HERSCHEL HALBERSTAM on behalf of himself and all other similarly
situated consumers v. GLOBAL CREDIT & COLLECTION CORP.**

**Docket No.: 1:15-cv-05696-BMC
Our File Number: 007602.000034**

Dear Judge Cogan:

We represent the defendant in the above matter. Currently pending before the court is a motion brought by the undersigned pursuant to 28 U.S.C. §1292(b) and Federal Rule of Appellate Procedure 5(a)(3) requesting that Your Honor certify his January 11, 2016 order on motions for summary judgment by both parties for an immediate petition for permission to appeal to the Second Circuit Court of Appeals.

Defendant's reply memorandum on that motion is currently due on March 24, 2016. I am writing to respectfully request an enlargement of time to file these reply papers to and including March 31, 2016. The reason for this request is that I am currently on trial in the Supreme Court of the State of New York, County of Suffolk before the Honorable Daniel Martin, J.S.C., on the case of *West v. Young*, (Suffolk County Index No.: 37896/08). Trial of this action is not expected to conclude until March 22 or March 23, 2016.

I have communicated with plaintiff's counsel, Adam Fishbein, Esq. with respect to this application. Mr. Fishbein has consented to the requested enlargement of time.

«Today: July 4, 1996»

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Thanking the court for its time and attention to this matter, I remain,

Very truly yours,

A handwritten signature in black ink, appearing to read 'B. Levien', with a long horizontal flourish extending to the right.

BRADLEY J. LEVIEN (BL-0503)

BJL/nmt

cc: **VIA ECF**

Adam J. Fishbein, Esq.

ADAM J. FISHBEIN, P.C.